

From: [Rafael Casanova](#)
To: [Dipanjana Bhattacharya](#)
Cc: [Gary Miller](#)
Subject: Gulfco - RAO Language in the Proposed Plan
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Following is the draft language of the Proposed Plan. Please let me know if we need to add or delete anything.

REMEDIAL ACTION OBJECTIVES

The Remedial Action Objectives (RAOs) for the Site were identified based on concerns related to future human health exposure associated with North Area ground water. The RAOs for contaminated ground water are: (1) to verify, on an ongoing basis, the continued stability of the VOC plume in Zones A and B, both in terms of lateral extent, and the absence of impacts above screening levels to underlying water-bearing units; and (2) to maintain, as necessary, protection against potential exposures to VOCs at levels posing an unacceptable risk via the ground water to indoor air pathway. The EPA's preliminary recommendation identified in this Proposed Plan will meet these RAOs.

RAOs consist of medium-specific goals for protecting human health and the environment. As such, RAOs are developed for those exposure pathways identified as posing an unacceptable risk to either: (1) human receptors as described in the HHRA, and/or (2) ecological receptors based on data developed in the BERA. Based on data presented in the Final BERA Report, no RAOs were developed based on ecological endpoints given the lack of potential risk to these receptors. As such, RAOs for the Site were identified to address concerns related to future human health exposure associated with North Area ground water.

The Final RI and HHRA Reports note that ground water in affected water-bearing units at the Site (*i.e.*, Zones A and B) and the next underlying water-bearing unit (*i.e.*, Zone C) is not useable as a drinking water source due to naturally high total dissolved solids (TDS) concentrations. Consequently, the only potentially unacceptable human health risks associated with COIs detected in Site ground water are for the pathway involving volatilization of VOCs from North Area ground water to a hypothetical indoor air receptor. This conclusion is based on the continued stability of the current COI plume, both in terms of lateral extent in Zones A and B and the absence of COIs in deeper water-bearing units. Restrictive covenants currently in place for Lots 55 through 57, which encompass the area of the VOC plume, require EPA and TCEQ notification and approval prior to construction of any buildings on these parcels. The restrictive covenants also advise that response actions, such as protection against indoor vapor intrusion, may be necessary prior to building construction.

Rafael Casanova, P.G. (Remedial Project Manager, Environmental Scientist)
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Work Telephone # - (214) 665-7437
Work Telephone Toll-Free # - 1(800) 533-3508
Facsimile # - (214) 665-6660



9543148

E-Mail - casanova.rafael@epa.gov

Assigned Sites for Investigation and Remediation:

(<http://www.epa.gov/earth1r6/6sf/6sf-tx.htm>):

Brine Service Company Superfund Site (Corpus Christi, Texas)

Falcon Refinery Superfund Site (Ingleside, Texas)

Many Diversified Interests, Inc. Superfund Site (Houston, Texas)

Palmer Barge Line Superfund Site (Port Arthur, Texas)

State Marine of Port Arthur Superfund Site (Port Arthur, Texas)